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February 14, 1985

Joseph R. Podlewski, Esq.  
Attorney, Enforcement Programs  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Re: Expedited Closure of Landfill  
Former NL Industries Granite City Facility

Dear Mr. Podlewski:

It is my understanding that one of the Agency's concerns regarding in-place closure of the landfill is the possible leaching of the slag which may have allegedly been buried in a "ravine" at the site. In accordance with our January 31, 1985 discussions, this letter and the attached exhibits will prove that the area beneath the current landfill site was not originally a depressed area.

Exhibit A indicates that the northwest boundary line of the current landfill is parallel to an "imaginary line" extended southwestward from Delmar Boulevard. As you know, the southeast boundary of the landfill parallels another line extended southwestward from Edison Avenue which would parallel State Street.

Exhibit B shows that the strip of land between State Street and the above-noted Edison Avenue (formerly known as E Street) which is the southeastern most extent of the existing landfill was utilized as a coal yard in 1903.

Exhibit C shows that the area occupied by the current landfill was the site of tracks 6, 7, 8 and 9 in 1906; presumably, the tracks would have been laid over a flat surface. Note that track 6 is immediately southeast of the powerhouse which occupies Building No. 8.

Exhibit D indicates that construction of a No. 9 Building for the production of white lead was contemplated in an area southeast of the powerhouse between tracks 8 and 9 at the site of the current landfill area. Please note the highlighted elevations at the north, east, south and west corners of the proposed building which are respectively 90.12, 89.3, 87.68, and 89.65 feet. From Exhibit E, these represent the surface elevations of soil test sites

NL Industries, Inc.  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443- 2499

EPA Region 5 Records Ctr.



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numbered 1, 3, 6 and 8, respectively. Exhibit F is an enlarged portion of the lower right section of Exhibit E which shows that all of Exhibit E's soil borings were made in the area encompassed by the current landfill.

Thus, Exhibits C, D, E and F confirm that the landfill area was originally flat and dipped gently downward towards the south. From Exhibit E, the area had never been filled, as the logs show the presence of naturally occurring soils. Apparently the White Lead Building, which was proposed in Exhibit D, dated April 8, 1904, was never constructed as its presence is not shown by the September 4, 1906 plat which comprises Exhibit C.

Thus, as so often happens, a logical analysis of these blueprints would appear to contradict information, obtained from IEPA's interviews with former NL Industries' employees, which alludes to the possible presence of a ravine or low spot at the site of the landfill.

If you have any questions regarding this matter, please telephone me at 609-443-2499. We would welcome a future opportunity to present our concept for expedited in-place closure of the landfill to your technical staff.

Very truly yours,

*William K. Weddendorf*  
*/db*

William K. Weddendorf  
Principal Environmental Engineer

WKW/db

attachments

cc: Director, Waste Management Division  
USEPA, Region V  
Attn: Neil Meldgin  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois EPA  
Attn: Jim Frank  
2200 Churchill Road  
Springfield, IL 62706

SEE REFERENCE SHEET

DATE OF DOCUMENT: July 14 1985

SITE NAME: NL INDUSTRIES

DESCRIPTION: EXHIBIT A, B, C, D, E and F.

DOCUMENT GENERATED BY: NL Industries Inc.

ALPHABETICAL SUBSECTION: W, 3

LOCATION OF DOCUMENT:

☐ FILE FOLDER

☒ ACCORDION FOLDER

☐ PRP SPECIFIC FILES

☐ OFFICE OF REGIONAL COUNSEL

☐ OTHER: \_\_\_\_\_

SENSITIVITY:

☐ CONFIDENTIAL BUSINESS INFORMATION

☐ ENFORCEMENT CONFIDENTIAL